

FILED

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1:22-cr-00651

Judge Martha M. Pacold

Magistrate Judge Gabriel A. Fuentes

THOMAS G. BRUTON, CLERK, U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Sept 20, 2023

UNITED STATES OF AMERICA)	
)	22 CR 651
v.)	
)	Violations: Title 18, United States
MCRA Y BRISCOE BRIGHT)	Code Sections 922(g)(1), 924(c)(1)(A),
(a/k/a "Mack"))	and 2113(a)
CHARLES MCFERREN, JR., and)	
FRANCISCO BOWLING)	SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL OCTOBER 2022 GRAND JURY charges:

On or about October 24, 2022, at Evanston, in the Northern District of Illinois,
Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
CHARLES MCFERREN, JR., and
FRANCISCO BOWLING,

defendants herein, by force and violence, and by intimidation, took from the person
and presence of a bank employee approximately \$27,742 in United States currency
belonging to, and in the care, custody, control, management, and possession of the
Bank of America, 1336 Chicago Avenue, Evanston, Illinois, the deposits of which were
then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 1, 2022, at Skokie, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
defendant herein, by force and violence, and by intimidation, took from the person and presence of a bank employee approximately \$21,861 in United States currency belonging to, and in the care, custody, control, management, and possession of the Bank of America, 9535 Skokie Boulevard, Skokie, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 26, 2022, at Calumet City, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
defendant herein, by force and violence, and by intimidation, attempted to take from the person and presence of a bank employee United States currency belonging to, and in the care, custody, control, management, and possession of the Bank of America, 1701 River Oaks Drive, Calumet City, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 26, 2022, at Skokie, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
defendant herein, by force and violence, and by intimidation, took from the person and presence of a bank employee approximately \$37,192 in United States currency belonging to, and in the care, custody, control, management, and possession of the Bank of America, 3328 West Touhy Avenue, Skokie, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FIVE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 26, 2022, at Skokie, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
defendant herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely bank robbery by force and violence, in violation of Title 18, United States Code, Section 2113(a), as charged in Count Four of this Superseding Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(C)(i).

COUNT SIX

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about December 10, 2022, at Buffalo Grove, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a “Mack”)

defendant herein, by force and violence, and by intimidation, took from the person and presence of a bank employee approximately \$22,141 in United States currency belonging to, and in the care, custody, control, management, and possession of the Bank of America, 55 West Lake Cook Road, Buffalo Grove, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT SEVEN

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about December 10, 2022, at Buffalo Grove, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack"),
defendant herein, did use, carry, and brandish a firearm during an in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely bank robbery, in violation of Title 18, United States Code, Section 2113(a), as charged in Count Six of this Superseding Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(c)(1)(C)(i).

COUNT EIGHT

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about December 16, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

MCRA Y BRISCOE BRIGHT (a/k/a "Mack")

defendant herein, knowing that he previously had been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Taurus, Model PT1911, .45 caliber pistol, bearing serial number NDT99451, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL OCTOBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g)(1), as set forth in Count Eight of this Superseding Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).
2. The property to be forfeited includes, but is not limited to, a Taurus, Model PT1911, .45 caliber pistol, bearing serial number NDT99451, and associated ammunition.

A TRUE BILL:

FOREPERSON

Signed by Christine O'Neill on behalf of the
ACTING UNITED STATES ATTORNEY